

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KAERURU DEBOER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 4:25-cv-1099
)	
EXPERIAN INFORMATION SOLUTIONS)	
INC. and TRANS UNION LLC)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR LEAVE
TO FILE FIRST AMENDED COMPLAINT

Plaintiff respectfully moves the Court, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, for leave to file an Amended Complaint, a copy of which is attached hereto as **Exhibit 1**. Accordingly, Plaintiff seeks the Court's leave to amend, which should be granted for the reasons set forth below.

STATEMENT OF FACT

Plaintiff's Complaint was filed on March 9, 2025 (Dkt. #1) alleging damages pursuant to the Fair Credit Reporting Act. Defendant Trans Union LLC filed its responsive pleading on April 3, 2025 (Dkt. #8). Defendant Experian Information Solutions Inc. has not filed a responsive pleading in this matter.

ARGUMENT

**I. PLAINTIFF HAS MET THE STANDARD FOR OBTAINING
LEAVE TO FILE AN AMENDED COMPLAINT UNDER
FEDERAL RULE OF CIVIL PROCEDURE 15(a)(2)**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), “a party may amend its pleading only with the opposing party’s written consent or the court’s leave. The court should freely give leave when justice so requires.” In the case at issue, Defendant Trans Union LLC is not opposed to the Motion to Amend, as reflected by the Certificate of Conference herein. Accordingly, in the interest of justice and consistent with the liberal standard that applies to motions to amend under Rule 15(a)(2), this Court should grant Plaintiff’s motion for leave to file the proposed amended complaint.

CONCLUSION

For the reasons outlined above, Plaintiff respectfully requests that this Court grant Plaintiff’s motion for leave to file the proposed amended complaint.

Respectfully submitted,

Dated: May 14, 2025

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CERTIFICATE OF CONFERENCE

Tiffany Hill, Esq., counsel for Plaintiff, emailed Sharonda Roberson, Esq., counsel for Defendant Trans Union LLC on May 14, 2025 regarding the relief requested in this Motion and provided a copy of the proposed Amended Complaint. Counsel for Defendant Trans Union LLC is not opposed to Plaintiff's Motion for Leave to File an Amended Complaint.¹

s/ Tiffany Hill
Tiffany Hill, Esq.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document, using the electronic case filing system of the Court and a copy of the foregoing was served upon all parties of record via CM/ECF.

Dated: May 14, 2025

s/ Tiffany Hill
Tiffany Hill, Esq.

¹ Defendant Experian Information Solutions Inc. has not entered an appearance in this matter.